

PAUL P. VANGELLOW, ESQ.

VSB 23488

Paul P. Vangellow, PC

6109A Arlington Blvd.

Falls Church, VA 22044

703-241-0506

Fx 703-241-0886

pvangellow@gmail.com

BRETT E. LEWIS (*pro hac vice* pending)

LEWIS & LIN, LLC

45 Main Street, Suite 608

Brooklyn, NY 11201

Telephone: (718) 243-9323

Facsimile: (718) 243-9326

Email: brett@iLawco.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

WAREHOUSE GOODS, LLC,

Case No.:

Plaintiff,

vs.

JOHN DOE,

Defendant.

**PROPOSED ORDER TO SHOW CAUSE FOR A PRELIMINARY INJUNCTION
AND TEMPORARY RESTRAINING ORDER**

Upon review of the Affidavit of Aaron Locascio, dated September 11, 2018, the Declaration of Brett E. Lewis, dated September 11, 2018, Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction, Plaintiff's memorandum of law in support

Plaintiff's Motion, and upon all pleadings and papers filed herein, it appears to the satisfaction of this Court that this is a proper case for granting the temporary restraining order and order to show cause.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff's *ex parte* application for a temporary restraining order is granted. Pending the hearing and determination of the order to show cause and to prevent further irreparable injury to Plaintiff and its customers,

1. PublicDomainRegistry ("PDR"), as the registrar(s) of record for the <GNLLN.COM > Domain Name listed in the Verified Complaint (the "Domain Name"), or whomever is the registrar of record of the Domain Name at the time this Order is entered, is/are directed to immediately and no later than 12 hours after service on PDR, via email at abuse@publicdomainregistry.com, of a copy of this Order, the complaint and all moving papers, to:

a. Record, change, transfer or assist in changing the registration of record for the Domain Name in Plaintiff's name and into an account with PDR, under Plaintiff's sole control, or a domain-name registrar of Plaintiff's choosing;

b. Place a legal lock on the Domain Name after said transfer(s) take place.

IT IS FURTHER ORDERED that the Plaintiff shall have full access to all functionality of the Domain Name and that the Defendant herein shall not impede Plaintiff's access in any manner; and,

IT IS FURTHER ORDERED that pending resolution of this lawsuit or further order of the court, plaintiff, after receiving the Domain Name, shall not transfer or dispose of said Domain Name, but shall retain them in order to restore same to PDR if this court shall ultimately determine that Plaintiff is the lawful owner of said Domain Name; and,

IT IS FURTHER ORDERED that, pursuant to Fed. R. Civ. P. 65(c), Plaintiff shall not be required to give security given the likelihood of success on the merits of Plaintiff's ACPA claim, and the ongoing damage to Plaintiff's business and revenues, and the fact that the evidence indicates that the above-named Defendant would suffer no harm; and,

IT IS FURTHER ORDERED that, pursuant to Fed. R. Civ. P. 4(f)(3), sufficient cause being shown therefore, counsel for Plaintiff shall serve a copy of this Order, the Motion, and all papers filed in support of this Order on Defendant Domain Name by email at frankmuller201809@gmail.com on or before September ___, 2018, which service shall be deemed good and sufficient; and,

IT IS FURTHER ORDERED that Plaintiff shall provide notice of this Order by serving a copy of this Order, the Motion, and all papers filed in support of this Order on nonparty PDR via email at abuse@publicdomainregistry.com on or before September ___, 2018; and,

IT IS FURTHER ORDERED that Defendant Domain Name shall have 48 hours from the date of delivery of the moving papers to file and serve their opposition papers, if any; and,

IT IS FURTHER ORDERED that Defendant Domain Name show cause before this Court, at Room_____, United States Courthouse for the Eastern District of Virginia at Alexandria, Virginia on September _____, 2018, at _____o'clock in the afternoon thereof, or as soon thereafter as counsel may be heard why the interim relief awarded in this Order should not be extended by issuance of a similarly worded preliminary injunction pending trial.

IT IS SO ORDERED.

TIME:

DATED:

United States District Judge